

CommonCheck Privacy Policy

Last updated: November 24, 2021

Welcome to The Commons Project Foundation! This Privacy Policy (“*Policy*”) describes how The Commons Project Foundation (“*TCP*,” “*we*” or “*us*”) collects, uses, and shares information about you when you use the CommonCheck service (“*Service*”) for verifying your health credentials and related entry requirements for travel to your anticipated destination. Before using the Service, please read the following carefully to understand how we will treat your Service Data.

Summary of Changes Made

None at this time. This is the initial policy.

Overview of the Service

You may have been directed to upload a digital health certificate (“**Certificate**”) and other personal information as part of a government’s travel portal or as part of TCP’s portal related to the Service. The Certificate also may contain a Quick Response Code (“**QR Code**”). This Service provides verification services to the government (of your anticipated destination) to verify the authenticity of the credential you provided, to match your vaccination and/or test results against the issuer (for instance, a health clinic) of your credential, and to compare your submitted information against the applicable government’s travel requirements for your anticipated destination and period of travel.

What We Collect

The data we collect is the following “*Service Data*”:

- *Information You Provide To Us.* In order to perform this Service, the information you provide (or that resides in your Certificate or the QR code) includes:
 - First and last name
 - Passport Number
 - Passport Issue Date
 - Nationality
 - Flight Number
 - Departure Date
 - Date of birth
 - Date of your vaccination(s) and/or diagnostic test(s)
 - Issuer of your vaccination(s) or diagnostic test(s)

- Issuer of your health credential
 - Maker of vaccination(s) and/or diagnostic test(s)
 - Type of vaccine(s) or/or diagnostic test(s) and result of test(s), if diagnostic
 - QR Code of your health credential
 - Your anticipated destination and dates of travel
 - Your anticipated country of travel
 - Your country of origin
 - Email address (only if you select OCR and manual verification (if applicable), when you submit paper based documents for OCR and human verification or if you reach out to us by email for technical or other requests)
 - Information you provide to us, such as by email in connection with technical assistance or other requests
- *Information We Collect Automatically.* We collect anonymized information related to how you use the CommonCheck Service.
 - *Processing of Information by Third Parties.* We may use third-parties to assist in providing the Service. Third-parties are used to provide or process verifications, facilitate ingestion of paper credentials and convert them to digital formats as well as process such verifications against the country requirements based on those credentials. Depending on your credential type, the Service will compare your information to a third-party (or our own) verification databases as part of the Service.

How We Use Information About You

- We do not sell your personal data or Service Data.
- We use your information solely for the purpose of providing the Service. The information you enter may be used to verify you as the owner of the provided Certificate, to compare your travel information against the applicable government's travel database of approved healthcare institutions and the government's health-related entry requirements, to verify the issuer of and information within your Certificate. Your information may be stored or shared as described in this policy.

How We Share Information

With respect to the Service, we may share information about you as follows:

- We share information with vendors, consultants, and other service providers who need access to such information to carry out our work or the Service;
- We may disclose personal data to law enforcement, regulators or others if we

believe in good faith that it's necessary (a) in connection with any legal investigation; (b) to comply with relevant laws or to respond to subpoenas or warrants served on us; (c) to protect or defend our rights, safety or property or of users of our products or services or others; and/or (d) to investigate or assist in preventing any violation of the law;

- We may share information if we believe your actions are inconsistent with applicable Terms and Conditions of Service, applicable laws or regulations.
- We may share information in connection with any financing or funding, or as required by applicable laws or regulations including those governing non-profit organizations; and
- We may share information between and among TCP, and its current and future parents, affiliates, subsidiaries, and other entities under common control and ownership.

How We Share Information

With respect to the Service, we may share information about you as follows:

- We share information with vendors, consultants, and other service providers who need access to such information to carry out our work or the Service;
- We may disclose your Service Data to law enforcement and other regulatory authorities if we believe in good faith that it's necessary (a) in connection with any legal investigation; (b) to comply with relevant laws or to respond to subpoenas or warrants served on us; (c) to protect or defend our rights, safety or property or of users of our products or services or others; and/or (d) to investigate or assist in preventing any violation of the law;
- We may share information if we believe your actions are inconsistent with applicable Terms and Conditions of Service, applicable laws or regulations.
- We may share information in connection with any financing or funding, or as required by applicable laws or regulations including those governing non-profit organizations; and
- We may share information with third party service providers which are necessary to provide the Services to you.

Information Not Covered

We may also share aggregated or de-identified or anonymized information, which cannot reasonably be used to identify you for our lawful business purposes, including

to analyze, build and improve the Service and improve our services, provided that we will not share such data in a manner that could identify you.

Security

We take reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration, and destruction.

Retention and Deletion

When you provide digital information (such as a Smart Health Card QR code) to TCP, we do not store your health or Service Data, other than as reasonably required to provide the Service or respond to your inquiries or requests, or as required by law or legal process.

TCP only stores your data long enough to make an assessment of the information provided for completion of the Service.

If you present an electronic copy (photo for example) of a paper document (such as a CDC vaccine card), it will be scanned via an OCR function and reviewed by a human. During this process the data related to the paper document provided will be temporarily saved to facilitate review/validation of the information provided. This storage duration will be limited to the time reasonably needed to review and return an assessment to the portal.

If you send us information outside of the Service, such as by email, we may store this information in accordance with applicable laws to enable us to respond to your request or email. If you provide protected data while communicating via email, we will destroy it at our earliest convenience or as required by law.

Children

The Service is not designed or intended for children under 13. If you are based outside the United States, you must be over the age required by the laws of your country to use the Services. Parental/guardian submission of children's data for the purposes of validating submitted information is permitted.

Your Choices

Under various laws and regulations, including the European Union General Data Protection Regulation (EU GDPR), individuals who are residents of applicable jurisdictions have the right to request certain information about their data collection practices or request deletion of their data under the law. TCP complies with the GDPR and applicable laws and regulations. Your rights may include:

Access: you may ask us if we hold your personal data and, if we are, you can request access to your personal data. This enables you to receive a copy of and information on the personal data we hold about you.

Correction: you may request that any incomplete or inaccurate personal data we hold about you is corrected.

Erasure: you may ask us to delete or remove personal data that we hold about you in certain circumstances.

Restriction: you may withdraw consent for our use of your personal data, or ask us to suspend the processing of certain of your personal data about you, for example if you want us to establish its accuracy.

If you wish to exercise any of your rights, you may contact us at privacy@thecommonsproject.org. Please include in your request sufficient information that allows us to reasonably verify that you are the person about whom we collected personal information. We may contact you if we are in need of information to support your request or verify your identity as related to the Service Data. TCP will not discriminate against you in any way based on your exercise of these rights or any rights protected by law.

Changes

We may change this Policy from time to time. If we do, we will let you know by revising the date at the top of the Policy. If we make a change to this policy that, at our sole discretion, is material, we will summarize the changes. We encourage you to review this Policy whenever you access or use Service. If you continue to use the Service after a Policy changes go into effect, you are consenting to the revised policy.

Contact Us

If you have any questions about this Policy, please email privacy@thecommonsproject.org or in writing to our US corporate office (**Please provide correspondence in English**):

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Attn: PRIVACY REQUEST